

MARK STEGER SMITH
Assistant U.S. Attorney
U.S. Attorney's Office
2601 Second Avenue North
Suite 3200
Billings, MT 59101
Ph: (406) 247-4667
Fax: (406) 657-6058
mark.smith3@usdoj.gov

JEAN E. WILLIAMS
Acting Assistant Attorney General
Environment and Natural Resources Division
United States Department of Justice

ARWYN CARROLL (MA Bar 675926)
LUTHER L. HAJEK (CO Bar 44303)
Natural Resources Section
P.O. Box 7611
Washington, D.C. 20044-7611
Ph: (202) 305-0465
Fax: (202) 305-0506
arwyn.carroll@usdoj.gov
luke.hajek@usdoj.gov

Counsel for Federal Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

WESTERN ORGANIZATION OF)
RESOURCE COUNCILS, *et al.*,)

Plaintiffs,)

v.)

U.S. BUREAU OF LAND)
MANAGEMENT,)

Defendant, and)

STATE OF WYOMING,)

Intervenor Defendant.)
_____)

Case No. 4:20-cv-00076-BMM-JTJ

**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO ANSWER THE FIRST
AMENDED COMPLAINT**

Defendant United States Bureau of Land Management respectfully requests the Court to extend its deadline to answer Plaintiffs' First Amended Complaint (ECF No. 21). Plaintiffs amended their complaint as a matter of course on December 14, 2020. *See* Fed. R. Civ. P. 15(a)(1)(B). In response, Defendant moved, among other things, to dismiss Plaintiffs' claims challenging the 2019 Buffalo Resource Management Plan Amendment (RMPA). The Court denied that motion on February 24, 2021 (ECF No. 34), rendering Defendant's and Intervenor Defendant's responsive pleadings due on March 10, 2021. Fed. R. Civ. P. 12(a)(4)(A).

During oral argument on that motion, Plaintiffs agreed that an amendment would be necessary to challenge at least the Rule of Decision approving the Miles City RMPA that was signed by Secretary Bernhardt on January 4, 2021. Plaintiffs have since indicated that they intend to again amend their complaint. Accordingly, to preserve resources, Defendant respectfully requests that the Court extend the deadline to respond to the First Amended Complaint until after resolution of Plaintiffs' anticipated motion to amend the complaint.

Undersigned counsel for Defendant has conferred with counsel for Plaintiffs and Intervenor Defendant, who indicated that no party opposes this motion.

DATED: March 4, 2021

Respectfully submitted,

JEAN E. WILLIAMS,
Deputy Assistant Attorney General
Environment & Natural Resources Division

/s/ Arwyn Carroll

ARWYN CARROLL (MA Bar 675926)
Trial Attorney, Natural Resources Section
United States Department of Justice
Environment and Natural Resources Div.
P.O. Box 7611
Washington, D.C. 20044-7611
Phone: (202) 305-0465
Fax: (202) 305-0506
arwyn.carroll@usdoj.gov

LUTHER L. HAJEK (CO Bar 44303)
Trial Attorney, Natural Resources Section
United States Department of Justice
Environment and Natural Resources Div.
999 18th St., South Terrace, Suite 370
Denver, CO 80202
Phone: (303) 844-1376
Fax: (303) 844-1350
luke.hajek@usdoj.gov

MARK STEGER SMITH
Assistant U.S. Attorney
U.S. Attorney's Office
2601 Second Avenue North, Suite 3200
Billings, MT 59101
Phone: (406) 247-4667
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Counsel for Federal Defendant

CERTIFICATE OF SERVICE

I certify that on March 4, 2021, a copy of the foregoing was served on all counsel of record via the Court's CM/ECF system.

/s/ Arwyn Carroll

ARWYN CARROLL

U.S. Department of Justice